

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION**

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<b>In Re:</b>	)	
	)	
<b>JOHN MALONE</b>	)	
	)	
	)	<b>Chapter 13</b>
	)	<b>Case No. 24-10885-CJP</b>
<b>Debtor</b>	)	
	)	

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**EMERGENCY MOTION TO CONTINUE THE FEBRUARY 18, 2025 HEARING ON  
SALE OF PROPERTY FREE AND CLEAR OF LIENS UNDER SECTION 363(F)  
RE: 26 SAVIN HILL AVENUE, DORCHESTER, MA**

Now comes, John Malone, (“Debtor”) by and through undersigned counsel, and by this motion (“Motion”), herein respectfully requests a continuance of the above referenced hearing.

As reasons therefore, undersigned counsel had to unexpectedly travel to Greenwich Connecticut for a family medical emergency during the first week of February 2025, which prevented undersigned counsel from arranging a meeting with the Debtor and the bidders, to allow said bidders to present and narrow their bids to the Debtor, and in addition to allow the Debtor to consider who he may decide will be his “landlord” under a life estate / use and occupancy arrangement.

Undersigned only returned home on Friday evening, February 14, 2025, and therefore is seeking said continuance in order to provide the Debtor with sufficient time to consider/narrow the issues related to the bids for the Property. Due to undersigned’s unexpected late return, he is only drafting the instant Motion at this time.

**WHEREFORE**, the Debtor respectfully requests a three week continuance of the February 18, 2025 hearing on the Debtor's Sale of Property under 363(f), or until such time that the Court's schedule will allow

Dated this 15th day of February 2025.

Attorney for the Debtor

/s/ Glenn F. Russell, Jr.  
Glenn F. Russell, Jr.  
BBO# 656914  
38 Rock Street, Suite #12  
Fall River, MA 02720  
(888) 400-9318  
russ45eq@gmail.com

#### CERTIFICATE OF SERVICE

I, Glenn F. Russell, Jr., do hereby certify that on the 15<sup>th</sup> day of February 2025, I served the Debtors' Emergency Motion to Continue the February 18, 2025 Hearing on the Debtor's Motion to Sell Property located at 26 Savin Hill Avenue, Dorchester, MA, to the following parties via electronic mail and submission to the ECF System, and/or by USPS postage prepaid to the following:.

***Assistant U.S. Trustee***

**John Fitzgerald**

Office of the US Trustee  
J.W. McCormack Post Office & Courthouse  
5 Post Office Sq., 10th Fl, Suite 1000  
Boston, MA 02109

***Trustee***

Carolyn Bankowski  
Ch 13-12 Trustee Boston  
P. O. Box 8250  
Boston, MA 02114  
617-723-1313

**28 Berkshire, LLC**

Peter Pasciucco  
50 Redfield Street, #201  
Dorchester, MA 02122

**Chloe, LLC**

James Erhard  
250 Commercial Street, Suite 410  
Worcester, MA 01608

**American Building Construction, Inc.**

c/o Mohamed Amer  
82 Union Street  
Quincy, MA 02169

**Janyuzak Almazabek**

42 Summer Street  
West Roxbury, MA 02132

**Boston Water and Sewer Commission**

P.O. Box 55466  
Boston, MA 02205

**City of Boston Real Estate Tax**

CITY OF BOSTON, BOX 55808  
Boston, MA 02205

**Discover Bank**

2479 Edison Blvd, Unity A  
Twinsburg, OH 44087-234

**Fed Home Loan Mortgage Corp as Trustee**

Brian M. Kiser, Esq.  
Marinosci Law Group, P.C.  
275 West Natick Road  
Suite 500  
Warwick, RI 02886

**National Grid**

P.O. Box 371338  
Pittsburgh, PA 15250-7338

**Specialized Loan Servicing, LLC**

Specialized Loan Servicing LLC  
P.O. Box 636005  
Littleton, CO 80163-6005

**The Bank of NY Mellon Indenture Trustee**

c/o Bank of America, N.A.

Marcus Pratt

Korde & Associates, P.C.

900 Chelmsford Street, Suite 3102

Lowell, MA 01851

/s/ Glenn F. Russell, Jr.

Glenn F. Russell, Jr.